

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

No. 17 Cr. 0061 (LAP)

v.

GARY TANNER and ANDREW
DAVENPORT,

Defendants.

**MOTION OF THE AIRCONDITIONING AND REFRIGERATION INDUSTRY HEALTH AND WELFARE
TRUST FUND, THE FIRE AND POLICE HEALTH CARE FUND, SAN ANTONIO, PLUMBERS LOCAL
UNION NO. 1 WELFARE FUND, THE NEW YORK HOTEL TRADES COUNCIL & HOTEL
ASSOCIATION OF NEW YORK CITY, INC. HEALTH BENEFITS FUND, AND THE DETECTIVES
ENDOWMENT ASSOCIATION OF NEW YORK CITY TO INTERVENE FOR THE LIMITED PURPOSE
OF OBTAINING COPIES OF THE TRIAL EXHIBITS**

PLEASE TAKE NOTICE that on a date and time that may be set by the Court, before the Honorable Loretta A. Preska, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, the Airconditioning and Refrigeration Industry Health and Welfare Trust Fund, the Fire and Police Health Care Fund, San Antonio, Plumbers Local Union No. 1 Welfare Fund, the New York Hotel Trades Council & Hotel Association of New York City, Inc. Health Benefits Fund, and the Detectives Endowment Association of New York City (together, “Intervenors”) will respectfully move this Court under Rule 24 of the Federal Rules of Civil Procedure for entry of an Order: (1) granting Intervenors’ motion to intervene in this action for the limited purpose of obtaining copies of the trial exhibits; (2) ordering Defendants Gary Tanner and Andrew Davenport to provide copies of the trial exhibits to Intervenors within 5 business days of the entry of the Court’s Order; and (3) ordering the Intervenors to pay Defendants’ reasonable costs of copying the exhibits.

This motion is based upon the accompanying Memorandum of Law in support of the motion, the accompanying Declaration of James A. Harrod and all exhibits attached to the Declaration, the trial record and other files in this action, and any other written or oral argument that may be permitted by the Court.

Dated: September 19, 2018

Respectfully submitted,

/s/ James A. Harrod

Hannah G. Ross

James A. Harrod

Jai K. Chandrasekhar

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